Before the
FEDERAL COMMUNICATIONS COMMISSSION
Washington, DC

In the matter of:	)	
	)	
In re: Delete, Delete, Delete	)	GN Docket No. 25-133
	)	
	)	

SUBMISSION SUPPORTING ELIMINATION (DELETION) OF 47 CFR 74.1283(c)(1) & (c)(2) Station Identification for Translators

74.1283(c)(1) states:

"(c) A translator station authorized under this subpart shall be identified by one of the following methods.

> ***(1)*** *By arranging for the primary station whose station is being rebroadcast to identify the translator station by call sign and location. Three such identifications shall be made during each day: once between 7 a.m. and 9 a.m., once between 12:55 p.m. and 1:05 p.m. and once between 4 p.m. and 6 p.m. Stations which do not begin their broadcast before 9 a.m. shall make their first identification at the beginning of their broadcast days. The licensee of an FM translator whose station identification is made by the primary station must arrange for the primary station licensee to keep in its file, and to make available to FCC personnel, the translator's call letters and location, giving the name, address and telephone number of the licensee or his service representative to be contacted in the event of malfunction of the translator. It shall be the responsibility of the translator licensee to furnish current information to the primary station licensee for this purpose."*

Western Inspirational Broadcasters, Inc. (WIBI), licensee of 26 FM translators[1] located throughout several western states respectfully submits the following in proposing the elimination of 47 CFR 74.1283(c)(1).

WIBI's compliance with the requirements of this rule means that three (3) times daily KNIS (the primary station) and its satellite facilities must broadcast a complete list of the 26 associated translators, their call letters and location. To do this, along with identifying the primary station, its satellite facilities, and the associated fm translators requires a significant amount of airtime with an annual total of approximately 53 hours of programming devoted to facility identification.

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[1] K208BR Eureka, NV; K208GF Thermopolis, WY; K209AU Portola, Etc. CA; K210BC Johnstonville, Etc. CA;
K210EL Diamondville, WY; K211FG Battle Mountain, NV; K213BF Quincy, CA; K213EL Laramie, WY; K214EV Winnemucca NV; K214FA Hawthorne, Etc., NV; K219KZ Worland, WY; K220CO South Lake Tahoe, Etc., CA; K220DT Ely, Etc., NV; K226BN Lyman, WY; K232CT Gillette, WY; K236BN

Cody, WY; K237FD Evanston, WY; K244DP Lander, WY; K245BH Cowley, Etc., WY; K246CZ Big Piney, LaBarge, WY; K257DP Pinedale, WY; K257EO Sheridan, WY; K257CE Chester, Etc., CA; K266AO Lovelock, NV; K269DE Buffalo, WY; K269EG Rawlins, WY; K273BY Riverton, WY.

WIBI respectfully submits that the FM translator identification information contains no meaningful information for the average listener. The translator call signs consist of the letter K, followed by three numbers and two arbitrarily assigned letters. The three numbers refer to the channel occupied by a particular FM translator. The general public is not aware of the relevance of the three numbers. It is only by referring to a chart of FM channels that the frequency of the associated translator can be determined from the given call sign. WIBI contends that listeners have no idea what the purpose of these call signs is. It seems evident the public interest would be better served by eliminating the time required for these announcements and, instead, using it for programming that would be more meaningful and relevant to those who listen.

WIBI recognizes the importance to the Enforcement Bureau of being able to promptly identify any source of alleged interference to other licensed facilities that may be caused by a particular FM translator, but that this objective is not necessarily being met by the requirements of 74.1283(c)(1). WIBI submits that waiting for several hours to hear an associated call sign is a significant waste of time for Bureau personnel and can be better utilized by referring to currently available database information relative to any facility in question. Reference to the hourly primary station identification announcements along with utilization of state-of-the-art monitoring equipment, can more efficiently enable identification. Using technological advances in remotely accessing FCC databases, FCC field staff now has immediate access to relevant information on primary and translator station parameters, as well as alternate technological means for locating sources of interference.

Alternate methods of FM Translator identification, as outlined in 74.1283(c)(2) are cost-prohibitive, particularly to non-profit non-commercial licensees attempting to conserve scarce fiscal resources. In WIBIs' case, this cost is primarily due to the types of translators employed in its network, which would require either a retrofit or replacement in order to accomplish local identification by the alternate methods outlined in 74.1283(c)(2). A network wide retrofit could cost upwards of $50,000. A majority of

these translators serve remote and isolated communities with populations of less than 5000 persons, which limits the funding available for such modifications.

Section 74.1283(e) of the Commission's Rules permits the Commission, at its discretion, to specify other methods of FM translator identification. The Commission, therefore, has recognized that there are circumstances in which waiver of the regular translator identification rule has been warranted.

There are instances when the Commission has waived 74.1283(c)(1)[2], with no known negative consequences.

In summary, WIBI proposes the deletion of 47.1283(c)(1)&(2), attesting to the fact that there is no useful public interest or regulatory purpose served by said rule sufficient to offset the significant time spent each year in identifying the associated FM translators which are simulcasting 100% of the primary station's programming. The general public is not given the practical information necessary to identify any particular translator and technological advances and database accessibility give FCC staff the necessary information to aid in any relevant investigation. There appears to be no compelling argument for the retention of 47.1283(c)(1)&(2) and deletion is hereby proposed.

[2] *By letter dated March 8, 1977 the Commission waived its Rule in connection with the station identification of FM translators rebroadcasting the programs of commercial FM station KSL-FM, Salt Lake City, Utah.*

By letter dated December 21, 1988 the Commission waived its Rule in connection with the station identification of FM translators rebroadcasting the programs of non-commercial KUER(FM), Salt Lake City, Utah.

By letter dated July 2, 1997 the Commission waived its Rule in connection with the station identification of FM translators rebroadcasting the programs of KUWR(FM), Laramie, Wyoming.